

### **Exhibit 3**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

CORROSION PREVENTION . 4:20-CV-02201  
TECHNOLOGIES LLC, . HOUSTON, TEXAS  
PLAINTIFF, . JULY 6, 2021  
VS. . 1:58 P.M.  
LOREN L. HATLE, .  
SANTIAGO HERNANDEZ, .  
TIMOTHY MULVILLE, .  
BEAR METAL TECHNOLOGIES LLC, .  
CORROSION EXCHANGE LLC, .  
DEFENDANTS. .  
.....

TRANSCRIPT OF MOTION HEARING  
BEFORE THE HONORABLE ANDREW S. HANEN  
UNITED STATES DISTRICT JUDGE

***APPEARANCES***

FOR THE PLAINTIFF:

John R. Keville  
Kyle A. Terao  
WINSTON STRAWN LLP  
1111 Louisiana Street  
Twenty-fifth Floor  
Houston, Texas 77002

***APPEARANCES - CONTINUED***

FOR THE DEFENDANTS:

Robb D. Edmonds  
EDMONDS & NOLTE PC  
2625 Bay Area Boulevard  
Suite 530  
Houston, Texas 77058

OFFICIAL COURT REPORTER:

Mayra Malone, CSR, RMR, CRR  
U.S. Courthouse  
515 Rusk  
Room 8004  
Houston, Texas 77002  
713-250-5787

Proceedings recorded by mechanical stenography. Transcript  
produced by computer-aided transcription.

1 here and let's sit down and figure out what the best way to  
2 proceed is.

3 MR. KEVILLE: Okay.

4 THE COURT: But whatever your obligation is right now  
5 to produce something, I'm holding that off too. I mean, that's  
6 part of staying everything because, you know, that would defeat  
7 the purpose of this whole thing if I ordered you to go ahead  
8 and produce the secret sauce without the patent bar.

9 MR. KEVILLE: Right. Right. Your Honor, the same  
10 thing, I assume everything is stayed? So all the documents  
11 that they said didn't exist that actually do exist, those  
12 get -- they get to hold them until after summary judgment?

13 THE COURT: Unless you can show me where it has  
14 something to do with the summary judgment.

15 MR. KEVILLE: That's one of the things I need to  
16 check.

17 THE COURT: I mean, if there is something to do with  
18 the summary judgment --

19 MR. KEVILLE: There may be, but I need to consider  
20 that.

21 THE COURT: Mr. Edmonds, you can assume that -- you  
22 know, even if it is tangentially related to the summary  
23 judgment, then I'm going to order it produced. So if you want  
24 to write him a letter and say, Hey, I have looked at this, we  
25 need X, Y and Z documents that the guy in Minnesota has, you

\* \* \* \*

I certify that the foregoing is a correct transcript from  
the record of proceedings in the above-entitled cause.

Date: July 9, 2021

*/s/ Mayra Malone*

-----  
Mayra Malone, CSR, RMR, CRR  
Official Court Reporter